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ROBERT M. JACKSON
OF COUNSEL

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LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

June 25, 2014

WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com
202-828-5562

REDACTED – FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2014
WC Dockets No. 14-58, 10-90 and 11-42

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules,¹ Peñasco Valley Telephone Cooperative, Inc. (PVT) hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,² PVT requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. PVT also requests confidential treatment for its Five Year Service Quality

¹ 47 CFR §§54.313 and 54.422.

² *In the Matter of Connect America Fund, et al.*, PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 12-1857, released November 16, 2013.

Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of PVT's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Salvatore Taillefer, Jr.", with a stylized flourish at the end.

Salvatore Taillefer, Jr.

Counsel to Peñasco Valley
Telephone Cooperative, Inc.

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau
Mr. Jay Umphlett, Peñasco Valley Telephone Cooperative, Inc.

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RE: Form 481 – Carrier Annual Reporting Data Collection, 2014
WC Dockets No. 14-58, 10-90, and 11-42

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Peñasco Valley Telephone Cooperative, Inc. ("PVT"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, PVT requests confidential treatment of the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, PVT states the following:

1. Identification of the specific information for which confidential treatment is sought.

PVT seeks confidential treatment of the Five Year Service Quality Improvement Plan, attachment 492270NM112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about PVT as well as information about PVT's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors,"¹ and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.²

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by PVT that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the confidential information is likely to result in substantial competitive harm to PVT because the confidential information could provide competitors with commercially sensitive insights related to PVT's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

PVT does not make the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way, and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

PVT does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

¹ *Id.* § 0.457(d)(2).

² 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

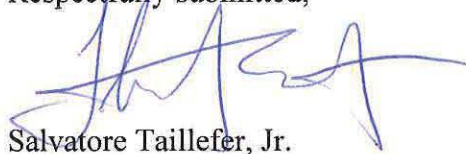
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The confidential information should be treated as confidential for an indefinite period, as PVT will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, PVT requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Salvatore Taillefer, Jr.', is written over the typed name.

Salvatore Taillefer, Jr.

Counsel for

Peñasco Valley Telephone Cooperative, Inc.

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FCC Form 481 - Carrier Annual Reporting	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Jay Umphlett
<035> Contact Telephone Number: Number of the person identified in data line <030>	5757481241 ext. 2270
<039> Contact Email Address: Email of the person identified in data line <030>	jumphlett@pvt.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
--	---	---

<100> Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)		
<200> Outage Reporting (voice)	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> ← check box if no outages to report			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<320> Unfulfilled Service Requests (broadband)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<400> Number of Complaints per 1,000 customers (voice)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 492270NM510.pdf	(attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 492270NM610.pdf	(attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> 492270NM1010.pdf	(attach descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)			
<2005>	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)			
<3005>	(complete attached worksheet)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com
<110> Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111> year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

492270NM112.docx

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

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[illegible]

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

[illegible]

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[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 492270
 <015> Study Area Name PENASCO VALLEY TEL
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Jay Umphlett
 <035> Contact Telephone Number - Number of person identified in data line <030> 5757481241 ext. 2270
 <039> Contact Email Address - Email Address of person identified in data line <030> jumphlett@pvt.com

<910> Tribal Land(s) on which ETC Serves

Mescalero Apache

<920> Tribal Government Engagement Obligation

492270NM920.pdf

<921>

- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)
NA
NA
NA
NA
NA
NA
NA
NA

(1100) No Terrestrial Backhaul Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2015

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

492270NM1210.pdf

<1220> Link to Public Website

HTTP www.pvt.com

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Certification
<2013>	2014 Frozen Support Certification
<2014>	2015 Frozen Support Certification
<2015>	2016 and future Frozen Support Certification
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband
Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification
<2018>	5th year Broadband Service Certification
<2019>	Interim Progress Certification
<2020>	
<2021>	Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3050-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011)



(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No)
(Yes/No)



(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)



(3016)



(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

492270RM3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)



If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020)

☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.
(3025)

☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

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Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No: 3060-0986/OMB Control No: 3060-0819
	July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PENASCO VALLEY TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/25/2014
Printed name of Authorized Officer: Kevin Bartley	
Title or position of Authorized Officer: CFO	
Telephone number of Authorized Officer: 5757481241 ext.	
Study Area Code of Reporting Carrier: 492270	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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Certification - Agent / Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pyt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

Attachments

REDACTED - FOR PUBLIC INSPECTION

PEÑASCO VALLEY TELEPHONE COOPERATIVE, INC.

LINE 112: FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

492270NM112

REDACTED IN ENTIRETY

REDACTED - FOR PUBLIC INSPECTION

492270NM510

Service Quality Standards and Consumer Protection Rules

New Mexico statutes specifically exempt rural ILECs, such as Peñasco Valley Telephone Cooperative, Inc. (PVT), from Service Quality Standards and Consumer Protection regulations. Nevertheless, PVT does comply with the quality of service standards for large and midsize ILECs as specified in NM Title 17, Chapter 11, Parts 22 and 24 regarding reporting requirements, service standards, outages and provision of service during maintenance and emergencies, and with the consumer protection rules listed in NM Title 17, Chapter 11, Part 16 regarding disconnection of basic local exchange service and allocation of partial payments, customer complaint tracking, access to service and rate information, fair marketing practices, billing disputes, discontinuance of service, payment plans, restoration of service and customer deposits.

N:\Home\SHARE\FCC Reporting\2013 FCC Annual Filing Information\Service Quality Standards and Consumer Protection-492270NM510

492270NM610

FCC Emergency Functioning

Peñasco Valley Telephone Cooperative, Inc., (PVT) has battery backup at all central offices, remote offices and electronic digital loop carrier sites. All of these sites are also either equipped with a standby generator or a connection for a portable generator. The portable generators are stored at various locations within PVT's service area so they can be deployed quickly as needed. All batteries are tested yearly and all standby generators are tested weekly.

PVT has planned for network issues by establishing alternate toll routes, and where possible, establishing fiber rings between our main host central office and our remote offices. The majority of PVT's toll traffic and interconnection trunks utilize a collapsed ring fiber segment from the Cottonwood host central office north to Century-Link in Roswell, NM. PVT also has a separate toll route going southeast to the Hobbs, NM AT&T point of presence, which also allows PVT to manage traffic spikes in emergency situations. PVT's SS7 signaling links are split between these two toll routes along with our long distance trunks so that a single fiber cut, even on our main fiber route cannot take us completely down and isolate our network. The interoffice fiber routes between PVT exchanges are all configured on collapsed rings. This provides equipment protection (dual interfaces) on the transport equipment, however, all of the signals travel in the same fiber jacket. A complete fiber cut on one of these routes in most cases will isolate that office so that calling inside the exchange is possible, but customers will not be able to place calls out of the local calling area.

PVT currently has 3 diverse paths for all of the broadband traffic. If one path goes down, the traffic can be switched over to another path.

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492270

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 227
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2014

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

[illegible]

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492270NM920

Tribal Information

Peñasco Valley Telephone Cooperative, Inc.'s (PVT's) study area presently includes 450 acres of Tribal land. The land was originally owned by an individual and then was deeded to the Mescalero Tribe.

However, there is no need for coordination with Tribal government pursuant to §54.313(a)(9) because there are no buildings on this land that would require any type of telephone or broadband service and thus no service is provided to the Tribal land. Furthermore, PVT has agreed to relinquish this 450 acre area to Mescalero Apache Telecom, Inc. (MATI), which would cause it to become part of MATI's study area, and the parties are currently pursuing regulatory approval of the transfer.

The New Mexico Public Regulatory Commission granted its approval of the transfer on November 26, 2013 (Case #13-00080-UT, filed March 13, 2013), and the parties have filed a Joint Petition for Waiver of Study Area Definition with the Federal Communications Commission (CC Docket No. 96-45, filed February 24, 2014). A comment cycle for the Joint Petition has been initiated.

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The national average is above Peñasco Valley Telephone Cooperative, Inc. rates in all exchanges.

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492270NM1210

Telephone Assistance Application Form for New Mexico

Name _____
(First) (Middle) (Last)

Address _____
(Street) (City) (State) (Zip)

Home Telephone Number: _____

PLEASE FILL OUT PART A - OR - PART B. DO NOT FILL OUT BOTH.

A: I, or a member of my household, currently participate in the following program(s): Check all that apply

- ☐ Medicaid ☐ Low-Income Home Energy Assistance Program (LIHEAP)
☐ Food Stamps ☐ Temporary Assistance for Needy Families program (TANF)
☐ Supplemental Security Income (SSI) ☐ National School Lunch program (NSL)
☐ Federal Public Housing Assistance, including Section

B: If you DO NOT participate in one of the programs listed above, you may qualify for telephone assistance based on the size and income level of your household. Please check the box below which applies to your household and attach one of the supporting documents described to the right:

Size of Household (Please check box)	Annual Household Income (150% of Federal Poverty Level)	Acceptable Types of Income Documentation (Please attach copy of one of these documents)
1	\$17,506	Previous Year State/Federal or Tribal Tax Return
2	\$23,596	Veterans Administration statement of benefits
3	\$29,686	Social Security Administration statement of benefits
4	\$35,776	Retirement/pension statement of benefits
5	\$41,866	Unemployment/Workers Compensation statement of benefits
6	\$47,956	Current year-to-date earnings statement from an employer or 3 consecutive months of pay stubs
7	\$54,046	Federal or tribal notice of participation Bureau of Indian Affairs General Assistance
8	\$60,136	Divorce decree or child support wage assignment statement
No. _____	Add \$6,090 for each additional person	

If you have telephone service with more than one company, you must select which company you would like to receive the Lifeline assistance from. You may not receive Lifeline from more than one company.

I agree to notify my phone company when I or a member of my household no longer participates in any of the above qualifying public assistance programs or when there has been a change in my family size or income level.

I certify under penalty of perjury the above information is true and that I am not receiving Lifeline credits on any other telephone account. I have read the information on this application and understand I must meet the above qualifications to receive Telephone Assistance (Lifeline).

Signature _____

Date _____

NEW MEXICO TELEPHONE ASSISTANCE PROGRAM



12-11-1326

492270NM1210

Low Income Telephone Assistance Program

Available Programs

Every person in America should have access to quality, affordable telecommunications service. This principle of **Universal Service** has been the goal of the telecommunications industry for decades. In 1934, the federal government codified the goal and reaffirmed it in 1996 by establishing policies for the **preservation and advancement of Universal Service**.

To achieve the Universal Service goal, carriers have access to a fund that is generated by contributions from the telecommunications providers in the United States. Telecommunications companies draw from the fund to provide for programs that support telecommunications services nationwide. The **Lifeline Assistance Program** (Lifeline) is part of the Fund's Low-Income Program as described in this brochure. **Toll Denial Service** is another program available to low income subscribers to help them control what they spend on telephone service.

Lifeline and Toll Limitations Service Support provide discounts to eligible low-income consumers to help them maintain telephone service.

Services Offered

Basic monthly service is \$15.28 per month which includes:

- Unlimited Local Calling
- 911 Service
- Directory & Operator Services

What type of discounts are available?

- **Lifeline** assistance lowers the cost of basic monthly local telephone service. Thanks to Federal and State support, eligible consumers can receive \$12.75 per month in discounts.
- **Toll Denial Service (TDN)** allows eligible consumers who wish to avoid incurring long distance fees to choose toll blocking at **no cost** if qualified for LITAP.

If you have additional questions about the information contained in this brochure, please contact our customer service representatives at **575.748.1241, 1.800.505.4844** or the Consumer Relations Division of the New Mexico Public Regulation Commission (NMPRC) at **1-888-427-5772**.

How do I know if I am eligible?

PVT follows FCC supported guidelines and is subject to state regulations. Individuals are eligible if participating in one of the following programs:

- Medicaid
- Low-Income Home Energy Assistance Program
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Temporary Assistance for Needy Families (TANF)
- National School Lunch
- Household income is at or below 150% of the federal poverty guidelines.

In addition, you may qualify for telephone assistance based on the size and income level of your household. See reverse side for guidelines.



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PEÑASCO VALLEY TELEPHONE COOPERATIVE, INC.

LINE 3017: RUS ANNUAL REPORT

492270NM3017

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